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VIA ELECTRONIC FILING

The Honorable Gregory M. Sleet
United States District Court
844 King Street
Wilmington, DE 19801

RE: Automotive Technologies International, Inc. v. American Honda Motor Company, Inc., et al., C.A. No. 06-187-GMS

Your Honor:

The Plaintiff's comments reached Mr. Grimm just after he forwarded the Agenda in this matter to Chambers. I was aware Mr. Grimm's letter was being sent at 10:00 and do not fault him for sending it before he received the Plaintiff's issues. As Item 1 on Mr. Grimm's agenda indicates, the plaintiff will no longer be objecting to the defendants' motion to stay. In the event Your Honor does stay this matter, the discovery items may be moot at this time. However, if Your Honor does wish to discuss issues raised by both parties, below you will find matters raised by plaintiff:

Plaintiff's Issues As To Elesys:

1. Elesys has failed to provide a response to Interrogatory No. 3 calling for fact or expert witnesses and the identification of documents or things intended to be relied on in trial.
2. We ask that Elesys identify with particularity by part and model number each component and subcomponent of the systems identified by Elesys.
3. The adequacy of Elesys's response to requests calling for production of financial information.
4. The production of documents that support the defense of inequitable conduct.
5. The production of 50,000 pages of documents withheld due to no protective order.

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6. The failure to produce samples of various models of accused devices.
7. The failure to produce documents relating to all subcomponents of the accused systems.
8. ATI contends, and has produced documents, showing that Elesys was aware of a number of ATI patents prior to this lawsuit. ATI seeks production of all documents responsive to Request For Production No. 51 and 52 and a listing on a privilege log of any documents that may be responsive that Elesys contends are protected by work product or other privileges.
9. The production of all documents relating to Phil Rittmeueller.

Plaintiff's Issues Relating to GM:

Plaintiff has the same issues as set forth above with respect to GM. In addition, GM has to date produced no documents. Further:

1. GM has refused to provide information or documents relating to all of the subcomponents of the accused systems. Specifically, GM has refused to provide information and financial information concerning the airbags, weight sensors, ECU's and associated subcomponents that make up the complete accused systems.
2. With respect to Interrogatory No. 9 [nee 10], each of the components at issue should be identified and its cost supplied
3. With respect to Interrogatory No. 7 (which was misidentified as No. 8), General Motors should respond and indicate the number of vehicles sold to date with the PSS.
4. Interrogatory No. 10 [nee 11] seeks information about the personnel at GM, not Elesys, most knowledgeable about the PSS system.
5. Request For Production Nos. 1, 3, 5-9 seek financial information concerning the prices paid for the components that make up the accused products.

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6. Request For Production No. 4 seeks information concerning the replacement sales, and supply sales of the accused products and their subcomponents to, among others, GM dealers.
7. Licensing information concerning the various safety-related licenses taken or issued by GM should be produced.
8. GM's knowledge of the patents in suit should be produced.
9. GM's knowledge and communications with Elesys or its predecessors should be produced.

Plaintiff's Issues With Honda:

Plaintiff has the same issues with Honda as it does with GM.

Respectfully,



Richard K. Herrmann, #405

RKH/prt

cc: Dr. Peter T. Dalleo, Clerk (via hand delivery)
Thomas C. Grimm, Esquire (via email)
Ralph J. Gabric, Esquire (via email)